

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

v.

2020 MCLAREN 600LT SPIDER, ET  
AL.,

Defendants.

Case No. 8:22-cv-00240

**ANSWER OF  
BRAD MOREHOUSE  
AND  
B&B REAL ESTATE COMPANY,  
LLC**

COMES NOW the Claimants, Brad Morehouse (“Morehouse”) and B&B Real Estate Company, LLC (“B&B”) collectively referred to herein as Claimants (“Claimants”) and for their Answer to the Amended Complaint for Forfeiture state as follows:

1. The Claimants deny paragraph 1 of the Amended Complaint.
2. The Claimants deny paragraph 2 of the Amended Complaint.
3. The Claimants deny paragraphs 3-45 of the Amended Complaint for the reasons that the allegations are either directed toward other Defendants or the Claimants are without sufficient information to admit or deny the allegations of the paragraphs. The allegations of paragraphs 3-45 are therefore denied.
4. With regard to paragraph 46 of the Amended Complaint, the Claimants admit that on or about December 21 Cook and Morehouse, through B&B, purchased the real estate located at 2203 23rd Street, Columbus, Nebraska (hereinafter “Property”). The Claimants further admit that Morehouse and Cook contributed money to purchase the Property and that the remaining balance was bank financed. The remaining allegations contained in paragraph 46 of the Amended Complaint are denied.
5. With regard to paragraph 47 of the Amended Complaint, the Claimants state that Cook provided additional monies to the B&B bank account, that Morehouse was interviewed regarding the matter and that the money that Cook deposited into B&B Real Estate is still held in the B&B bank account. Claimants deny the remaining allegations of paragraph 47 of the Amended Complaint.
6. The Claimants deny paragraphs 48-75 of the Amended Complaint

for the reason that said allegations are directed toward other Defendants and that no response of these Claimants is required. In the event that these allegations are interpreted as allegations against these Claimants, paragraphs 48-75 are denied.

7. The Claimants deny each and every other allegation of the Amended Complaint not specifically admitted herein except those allegations which constitute an admission against the government's interest.

8. By way of affirmative defense, the Claimants state that Cook is a dissociated member by reason of the Operating Agreement and Nebraska Statutes.

9. By way of further affirmative defense the Claimants state that the Amended Complaint fails to state a cause of action upon which relief may be granted.

10. By way of further affirmative defense Claimants had no knowledge that the source of the funds used by Brian Cook to purchase the real estate were unlawfully obtained.

#### **DEMAND FOR JURY**

Claimants B&B Real Estate, LLC and Brad Morehouse hereby demand a jury trial on the Plaintiff's Amended Complaint.

WHEREFORE, having fully answered the Amended Complaint, Claimants pray that it be dismissed and for such other and further relief the Court deems just and equitable.

Dated this 25th day of August, 2022.

B&B Real Estate, LLC and Brad  
Morehouse, Claimants

By: /s/ John A. Svoboda

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Attorneys for B&B Real Estate, LLC  
and Brad Morehouse, Claimants.

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 25th day of August, 2022, a copy of the above and foregoing was electronically filed with the Clerk of Court using the CM/ECF system of the Court which sent notification electronically of such to all CM/ECF participants, and was sent by U.S. mail, first class, postage prepaid, to the following:

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/s/ John A. Svoboda

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